

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**ROSHANDA FOSTER,**

**Plaintiff,**

**v.**

**LEGACY KEYS, LLC; 1250 NORTH  
INVESTMENTS LLC, WATKINS  
REALTY SERVICES, LLC;  
INVESTORS MANAGEMENT  
GROUP, INC.; OAK COAST  
PROPERTIES, LLC and JOHN  
DOES #1-5,**

**Defendants.**

**CIVIL ACTION  
FILE NO. \_\_\_\_\_**

**NOTICE OF REMOVAL**

Petitioner Legacy Key, LLC<sup>1</sup> hereby submits this Notice of Removal of the action herein referred to from the State Court of Fulton County, Georgia, to the United States District Court for the Northern District of Georgia, Atlanta Division, and respectfully shows to the Court the following:

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<sup>1</sup> Plaintiff incorrectly named this Defendant as “Legacy Keys, LLC.” The correct name of this entity is “Legacy Key, LLC.”

1.

Petitioner herein is a Defendant in a civil action brought in the State Court of Fulton County, Georgia, that is entitled *Roshanda Foster v. Legacy Keys, LLC, et al*, Civil Action File No. 17EV001550. Attached hereto and made a part hereof as Exhibits are true and correct copies of the following pleadings<sup>2</sup> that are on file with the State Court of Fulton County:

Exhibit “A” - Plaintiff’s Complaint;

Exhibit “B” - Collected Summonses to all Defendants; and

Exhibit “C” - Collected Proofs of Service on Defendants.

To the best of Petitioner’s knowledge, Exhibits “A” through “C” constitute all of the pleadings which have been filed in the State Court of Fulton County in the subject case.

2.

The aforementioned action was commenced by the filing of the Complaint on April 3, 2017.

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<sup>2</sup> Discovery documents were served with the Complaint. But, as Petitioner understands the Federal Rules and this Court’s Rules, discovery materials are not pleadings and are not to be filed unless and until needed as evidence in the action. Therefore discovery materials are expressly excluded from this listing and will not be filed with the Court.

3.

Petitioner was served on April 11, 2017. This Petition is filed within thirty (30) days after receipt by the Petitioner, through service or otherwise, of a copy of a pleading, amended pleading, motion, order or other paper from which it may first be ascertained that the case is one which is or has become removable, pursuant to 28 U.S.C. §1446(b) and F.R.C.P. 6(a)(1)(c).<sup>3</sup>

4.

This Court has jurisdiction over this action pursuant to §1332 of Title 28 of the United States Code because there is complete diversity of citizenship between the Plaintiff and all Defendants and because the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.<sup>4</sup>

5.

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<sup>3</sup> This Notice is filed within 30 days of the date of Service of Investors Management Group, Inc., Legacy Key, LLC, Watkins Realty Services, LLC and 1250 North Investments, LLC, who were all served on April 11, 2017. Oak Coast was later served on April 19.

<sup>4</sup> In the Complaint, Plaintiff specifically alleges that she “suffered scalding burn injuries, severe scarring, extraordinary pain, numerous surgeries, over \$200,000.00 in medical bills, skin grafting, and other injuries to be proven at trial.” (Complaint ¶ 30). Thus, while denying liability for these alleged damages, Petitioner has a good-faith belief that the amount in controversy exceeds the \$75,000 threshold requirement to invoke diversity jurisdiction. *See Farley v. Variety Wholesalers, Inc.*, 2013 U.S. Dist. LEXIS 57740 (M.D. Ga. Apr. 23, 2013).

Upon information and belief, Petitioner shows that the controversy between the Plaintiff and Defendants is a controversy between a citizen and resident of the State of Georgia (Plaintiff) and the Defendants, none of which is a citizen or resident of the State of Georgia.

6.

Plaintiff was at the time of the commencement of this action and still is a citizen and resident of the State of Georgia. (Complaint ¶1).

7.

Petitioner Legacy Key, LLC is a limited liability company, which, after some intermediate layers of additional LLCs,<sup>5</sup> is owned by Neil Schimmell, Matthew Heslin, Philip Nahas, and Greg Burden. Each of those individuals is a resident of the State of California.

8.

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<sup>5</sup> The direct members of Legacy Key are IMG Legacy Key, LLC and Sandy Apt. Investments, LLC. IMG Legacy Key, LLC's member is IMG Group Holdings, LLC. That LLC's members are IMG Holding Partners, LLC and Neil Schimmel and Mr. Schimmel is the sole member of IMG Holding Partners, LLC. Sandy Apt. Investors members are Matthew Heslin, Philip Nahas, and Greg Burden.

Defendant Investors Management Group, Inc. was at the time of the commencement of this action and still is a corporation organized under the laws of the State of California, whose principal place of business is California.

9.

Defendant 1250 North Investments, LLC is a limited liability company, which, after some intermediate layers of additional LLCs,<sup>6</sup> is owned by Matthew Heslin, Philip Nahas, Nicholas Coe and Greg Burden. Each of those individuals is a resident of the State of California.

10.

Defendant Watkins Realty Services, LLC is a single-member limited liability company. That member is Dave Watkins, who is a resident of the State of Florida.

11.

Defendant Oak Coast Properties is a limited liability company owned by Philip Nahas and Matthew Heslin, residents of California.

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<sup>6</sup> The members of Defendant 1250 North Investments are Heslin Investors, LLC, which is owned by Matthew Heslin, Nahas Investments, LLC, which is owned by Philip Nahas, COOVAC VENTURE I, LLC, which is owned by Nicholas Coe, and TECOLOTE II-WEHO, LLC, which is owned by Greg Burden.

12.

All of the named and served parties to this suit consent<sup>7</sup> to the removal of this action to this Court. All of the named Defendants are diverse from Plaintiff and complete diversity exists. The matter in controversy exceeds the value of \$75,000.00, exclusive of interest and costs, and is a civil action brought in a State Court of the State of Georgia, of which the United States District Courts have original jurisdiction because of diversity of citizenship and the amount in controversy pursuant to 28 U.S.C. §1332.

13.

Based on the complete diversity that exists between the parties and the amount in controversy, the pending action is one that Petitioners are entitled to remove to this Court pursuant to 28 U.S.C. §§1332, 1446(b).

WHEREFORE, Petitioner prays that this Petition for Removal be filed and that said action be removed to and proceed in this Court and that no further proceedings be had in the said case in the State Court of Fulton County, Georgia.

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<sup>7</sup> Although they expressly consent to the removal of this matter to this Court, Defendants specifically reserve their right to contest this Court's exercise of personal jurisdiction over them. *See Nationwide Eng'g & Control Sys., Inc. v. Thomas*, 837 F.2d 345, 347-48 (8th Cir. 1988) ("Removal, in itself, does not constitute a waiver of any right to object to lack of personal jurisdiction").

Respectfully submitted this 11th day of May, 2017.

**HAWKINS PARNELL  
THACKSTON & YOUNG <sup>LLP</sup>**



303 Peachtree Street, N.E.  
Suite 4000  
Atlanta, Georgia 30308-3243  
(404) 614-7400  
(404) 614-7500 (facsimile)  
[skeith@hptylaw.com](mailto:skeith@hptylaw.com)

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C. Shane Keith  
Georgia Bar No. 411317  
*Counsel for the Petitioners*

# EXHIBIT A



State Court of Fulton County

**\*\*E-FILED\*\***

17EV001550

4/3/2017 5:09:52 PM

LeNora Ponzio, Clerk

Civil Division

**IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA**

ROSHANDA FOSTER

*Plaintiff,*

vs.

LEGACY KEYS, LLC; 1250 NORTH  
INVESTMENTS, LLC; WATKINS REALTY  
SERVICES, LLC; INVESTORS MANAGEMENT  
GROUP, INC.; OAK COAST  
PROPERTIES, LLC; and JOHN DOES # 1-5

*Defendants.*

CIVIL FILE ACTION

No.: \_\_\_\_\_

**JURY TRIAL  
DEMANDED**

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**COMPLAINT**

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**Parties & Procedural Jurisdictional Statement:**

1.

Roshanda Foster is an honorable discharged combat veteran of the 82 Airborne Division of the US Army who currently resides in Fulton County Georgia.

2.

Defendant Legacy Key, LLC (hereinafter "Legacy Key") is a foreign for profit limited liability company that may be served through its registered agent National Registered Agents, Inc. at 1201 Peachtree Street NE, Atlanta, Fulton County, GA 30361.

3.

Jurisdiction and venue are proper in this action as to Defendant Legacy Key.

4.

Defendant Legacy Key was properly served with process in this action.

5.

Defendant Legacy Key's principal place of business is Legacy Key Apartments in Fulton County Georgia.

6.

Defendant 1250 North Investments, LLC (hereinafter "1250 Investments") is a foreign for profit limited liability company that may be served through its registered agent Corporation Service Company at 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia, 30092.

7.

Jurisdiction and venue are proper in this action as to Defendant 1250 Investments.

8.

Defendant 1250 Investments was properly served with process in this action.

9.

Defendant 1250 Investments principal place of business is Legacy Key Apartments in Fulton County Georgia.

10.

Defendant Watkins Realty Services, LLC (hereinafter "Watkins Realty") is a foreign for profit limited liability company that may be served through its registered agent CT Corporation at 1201 Peachtree Street NE, Atlanta, Fulton County, Georgia 30361.

11.

Jurisdiction and venue are proper in this action as to Defendant Watkins Realty.

12.

Defendant Watkins Realty was properly served with process in this action.

13.

Defendant Investors Management Group, Inc. (hereinafter "Investors Management") is a foreign for profit corporation that has not registered to do business in Georgia with the Georgia Secretary of State. Defendant Investors Management may be served through its California registered agent W. Eric Fulton at 16030 Ventura Blvd, Suite 240, Encino, CA 91436.

14.

Jurisdiction and venue are proper in this action as to Defendant Investors Management.

15.

Defendant Investors Management was properly served with process in this action.

16.

Defendant Oak Coast Properties, LLC (hereinafter "Oak Coast Properties") is a foreign for profit limited liability company that has not registered to do business in Georgia with the Georgia Secretary of State. Defendant Oak Coast Properties may be served through its California registered agent Matthew J. Heslin at 24321 South Pointe Drive, Suite 270, Laguna Hills, CA 92653.

17.

Jurisdiction and venue are proper in this action as to Defendant Oak Coast Properties.

18.

Defendant Oak Coast Properties was properly served with process in this action.

**Additional Procedural Matters:**

19.

Defendant John Doe(s) # 1- 5 are commercial business(es) and/or individuals(s) that were engaged in ownership, operation, control, management, or in providing contracting services at the premises – Legacy Key Apartments – located in Summit Springs Drive in Sandy Springs Georgia. The identities of John Doe(s) are unknown to Plaintiff at this time but the identities are known by and are readily ascertainable by one or more of the Defendants. Once the identities of John Doe(s) are discovered, this Complaint will be amended to substitute any party that is or may be liable to Plaintiff.

20.

Defendants consent to electronic service of the pleadings as is allowed by O.C.G.A. § 9-11-5(f), and therefore, have placed an e-mail address below the signature block of their answers.

21.

Pursuant to O.C.G.A. § 9-11-45(a)(1)(B), Plaintiffs and Defendants agree that their attorneys who are listed in the pleadings may issue and sign subpoenas for persons sought to be deposed in this action so long as the attorneys follow State Disciplinary Board Advisory Opinion No. 40 by providing deposition notices for each person on whom a subpoena is served.

**Operative Facts, Damages, and Claim for Legal Relief:**

22.

At all times mentioned herein, Defendant Legacy Key and Defendant 1250 Investments jointly owned and operated an apartment complex known as Legacy Key Apartments with its

main office at 8800 Dunwoody Place, Sandy Springs, Fulton County, GA 30350. The property includes, but is not limited to a drive, an apartment management office, common area parking lots, common area nature / wooded areas, and at least 20 stand-alone apartment buildings with each building containing multiple apartment units and maintenance closets.

23.

At all times mentioned herein, Defendant Watkins Realty was an independent contractor of either Defendant Legacy Key, Defendant 1250 Investments, or both who was charged with handling the day to day management of Legacy Key Apartments.

24.

At all times mentioned herein, Defendants Legacy Key, Defendant 1250 Investments, or both maintained and/or assumed control over Defendant Watkins Realty in the operation of Legacy Key Apartments.

25.

Defendant Investor Management and Defendant Legacy Key are agents, alter egos, joint ventures, and wholly owned and controlled subsidiaries of one another who have formed two separate corporate identities but who operate as one entity. As such, these Defendants cannot use their corporate form to shield their wrongdoing and avoid tort liabilities, tax liabilities, and other liabilities under the law.

26.

Defendant Oak Coast Properties and Defendant 1250 Investments are agents, alter egos, joint ventures, and wholly owned and controlled subsidiaries of one another who have formed two separate corporate identities but who operate as one entity. As such, these Defendants cannot use their corporate form to shield their wrongdoing and avoid tort liabilities, tax

liabilities, and other liabilities under the law.

27.

At all relevant times, Plaintiff was a tenant at Legacy Key Apartments and Defendants were her landlords. Plaintiff was therefore an invitee at the property and a beneficiary of the services provided by Defendants.

28.

On the morning of November 27, 2016, Plaintiff Foster was preparing to go to church and therefore decided to take a shower in the master bathroom of her apartment unit which was unit 1402 at Legacy Keys Apartments.

29.

After Plaintiff Foster turned on the shower water in her bathroom and stepped into the tub to begin bathing, the water became extraordinarily hot.

30.

Because of the extraordinarily hot water, Plaintiff Foster suffered scalding burn injuries, severe scarring, extraordinary pain, numerous surgeries, over \$200,000.00 in medical bills, skin grafting, and other injuries to be proven at trial.

31.

Prior to the injury, Plaintiff Foster did not know about any problems with / issues with the shower water, and she lacked knowledge of the dangerous hazardous condition despite the exercise of ordinary care.

32.

At all times, Plaintiff Foster exercised ordinary care and diligence under the circumstances then existing.

33.

Defendants breached their legal duty to keep the premises in a state consistent with the due regard for the safety of its residents and invitees, including Plaintiff Foster, by failing to exercise ordinary care to keep its premises safe and failing to act as similarly situated businesses in like circumstances.

34.

Prior to and on November 27, 2016, Legacy Key Apartments was negligently maintained, inspected, secured, patrolled, and managed. Defendants had knowledge, both actual and constructive, of the need to properly maintain, secure, inspect, patrol, and manage said property, but failed to exercise ordinary care to do so.

35.

Defendants had actual and constructive knowledge of dangerous hot water existing on its property prior to the severe burn incident involving Plaintiff. Said dangerous condition was negligently permitted to exist and remain at said premises.

36.

Defendants had actual and constructive knowledge of dangerous hot water existing on its property prior to the severe burn incident involving Plaintiff, but negligently failed to warn their invitees, including Plaintiff, of the existence of the aforementioned dangerous hot water and the likelihood that someone would be badly burned.

37.

Defendants negligently failed to maintain adequate security devices to prohibit improper use of or access to areas of the property that control hot water temperatures, and failed to have adequate and proper security checks of hot water temperatures thereby causing

an unreasonable risk of injury to their invitees, including Plaintiff Foster.

38.

Defendants knew of, or with the exercise of due care for the safety of its invitees should have known of, the dangerous and hazardous conditions existing on the premises and that failure to maintain, inspect, secure, patrol, and manage the premise would likely result in the injuries suffered by Plaintiff Foster, but Defendants failed to act to correct, prevent, or warn of the dangerous condition and dangerous environment of said property.

39.

Defendants were and are *negligent per se*.

40.

Defendants were negligent and said negligence proximately caused Plaintiffs' injuries in the following ways:

- a. Violation of O.C.G.A. § 51-3-1 by failing to use ordinary care to keep the premises safe;
- b. Violation of O.C.G.A. § 44-7-14 by failing to keep the premises in repair;
- c. Violation of O.C.G.A. § 8-2-20(9)(A)(i)(V) and O.C.G.A. § 8-2-20(9)(B)(i)(V) as incorporated into state minimum standards by O.C.G.A. § 8-2-25(a) by failing to adhere to the International Codes with Georgia Amendments;
- e. Violation of Sec. 105-19(a) of the Sandy Springs City Code by failing to adhere to the minimum standard codes;
- f. Violation of O.C.G.A. § 25-15-10 *et al* by violating to the Boiler and Pressure Vessel Safety Act;
- g. In failing to properly inspect and maintain the premises;
- h. In failing to warn of the latent dangers on the premises;
- i. In breaching tort duties to provide proper security for the safety of Plaintiff;



- j. In failing to properly train and supervise its employees and independent contractors in regard to the maintenance and safety of the premises;
- k. In failing to properly retain, entrust, hire, train, and supervise said employees and independent contractors;
- l. In failing to implement appropriate safety measures to detect and deter hot water dangers; and
- m. In violating industry standards of the apartment ownership / operation industry with such violation leading to the hot water dangers.

41.

Defendants had actual knowledge of the dangerous and hazardous conditions existing at the premises due to the direct knowledge of their employees and agents.

42.

Defendants had constructive knowledge of the dangerous and hazardous conditions existing on the premises through the knowledge of their employees and agents and due to the prior similar issues associated with the property and surrounding areas.

43.

Alternatively, Plaintiff intends to rely on the doctrine of *res ipsa loquitar* concerning the cause of the hot water since the hot water heater at issue was located in an outdoor maintenance closet on the property and under Defendants possession and control.

44.

Defendants negligently failed to maintain a policy, procedure, or system of investigating, reporting, and warning of the aforementioned hot water heater dangers and negligently maintained property.

45.

Defendants are liable for the injuries to Plaintiff Foster which occurred without

necessity, privilege, or consent.

46.

Because Defendants had knowledge of, or in the exercise of reasonable care, should have had knowledge of the dangerous environment of said property, Defendants are liable for the negligent supervision, hiring, training, and retention of their employees and the entrustment of said property to their agents and employees. Said negligence was the proximate cause of the damages and injuries to Plaintiffs.

47.

Defendants negligently represented to their invitees and residents that the property at issue was properly maintained and secured.

48.

Defendants negligently failed to provide adequate security protection and inspection related to hot water heaters at property.

49.

Defendants failed to take appropriate action to remedy or reduce the danger to its invitees, including Plaintiff Foster, and allowed the dangerous environment on the subject property to continue to exist unabated.

50.

Each of the forgoing acts and omissions constitute an independent act of negligence on the part of Defendants and one or more of the above stated acts were the proximate cause of the injuries to Plaintiff Foster. But for said tortious acts, Plaintiff Foster would not have suffered injuries.

51.

All Defendants are jointly and severally liable for the injuries and all damages recoverable under Georgia law.

52.

All Defendants are vicariously liable for any negligent conduct of Defendant Watkins Realty that caused injuries and damages to Plaintiff Foster recoverable under Georgia law.

53.

Plaintiffs sustained injuries and damages, which were directly and proximately caused by the negligence of Defendants. But for the negligence of Defendants, Plaintiff Foster would not have suffered serious injury, physical pain, and mental and psychological suffering.

54.

As a result of Defendants' negligence, Plaintiff incurred reasonable and necessary medical expenses exceeding \$200,000.00, and Plaintiff will continue to incur medical expenses in the future.

55.

Plaintiff is entitled to recover all elements of her damages allowed under Georgia law, including but not limited to:

- a. Personal injuries;
- b. Past, present and future pain and suffering;
- c. Disability;
- d. Disfigurement;
- e. Mental anguish;
- f. Loss of the capacity for the enjoyment of life;

- g. Incidental expenses;
- h. Past, present and future medical expenses;
- i. Permanent injuries;
- j. Lost wages;
- k. A diminished capacity to labor; and
- l. Consequential damages to be proven at trial.

56.

Plaintiff is entitled to recover all expenses and attorney's fees pursuant to O.C.G.A. § 13-6-11 because Defendants have acted in bad faith, been stubbornly litigious, and caused Plaintiffs unnecessary trouble and expense.

57.

The jury is entitled to impose punitive damages because the actions of Defendants showed an entire want of care, which would raise the presumption of conscious indifference to consequences.

58.

Each of the forgoing acts and omissions constitute an independent act of negligence on the part of the Defendants, and one or more of the above stated acts were the proximate causes of the injuries and damages sustained by the Plaintiff.

WHEREFORE, Plaintiff prays for a judgment against Defendants for the following:

- 1) Plaintiff be awarded actual damages in amounts to be shown at trial;
- 2) Plaintiff be awarded all general, special, compensatory, economic, and other allowable damages in accordance with the enlightened conscience of an impartial jury from the Defendants;
- 3) Punitive damages be imposed on Defendants in an amount to be determined by

the enlightened conscience of the jury;

- 4) Plaintiff be awarded a trial by jury; and,
- 5) Plaintiff have such other relief as this Court deems just and appropriate under the circumstances.

**TRIAL BY JURY IS HEREBY DEMANDED**

This 3<sup>rd</sup> day of April, 2017.

**THE STODDARD FIRM**

/s/ Matthew B. Stoddard  
Matthew B. Stoddard  
Georgia Bar No. 558215  
Keith N. Evra  
Georgia Bar No. 810271  
Attorneys for Plaintiff

**THE STODDARD FIRM**  
5447 Roswell Road  
Suite 204  
Atlanta, GA 30342  
P: 404-593-2695  
F: 404-264-1149  
[matt@thestoddardfirm.com](mailto:matt@thestoddardfirm.com)  
[keith@thestoddardfirm.com](mailto:keith@thestoddardfirm.com)

# EXHIBIT B

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Roshanda Foster

1533 Chattahoochee Circle

Roswell, GA 30075

Plaintiff's Name, Address, City, State, Zip Code

vs.

Watkins Realty Services, LLC

C/o: CT Corporation System

1201 Peachtree St., NE Atlanta, GA 30361

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

## SUMMONS

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Matthew B. Stoddard

Address: 5447 Roswell Road, Suite 204

City, State, Zip Code: Atlanta, GA 30342

Phone No.: 404-593-2695

An answer to this complaint, which is herewith served on you, should be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through E-file GA or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.

  
 LeNora Ponzo, Interim Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs undenied will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

## SERVICE INFORMATION:

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Roshanda Foster  
 1533 Chattahoochee Circle  
 Roswell, GA 30075

Plaintiff's Name, Address, City, State, Zip Code

vs.

Oak Coast Properties, LLC  
 C/o: Matthew J. Heslin  
 24321 South Pointe Dr., Ste. 270, Laguna Hills, CA 92653

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

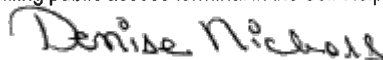
## SUMMONS

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:  
 Name: Matthew B. Stoddard

Address: 5447 Roswell Road, Suite 204City, State, Zip Code: Atlanta, GA 30342Phone No.: 404-593-2695

An answer to this complaint, which is herewith served on you, should be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through E-file GA or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.



LeNora Ponzio, Interim Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs undenied will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

## SERVICE INFORMATION:

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)



GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Roshanda Foster

1533 Chattahoochee Circle

Roswell, GA 30075

Plaintiff's Name, Address, City, State, Zip Code

vs.

Legacy Key, LLC

C/o: National Registered Agents, Inc.

1201 Peachtree St., NE, Atlanta, GA 30361

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
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<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
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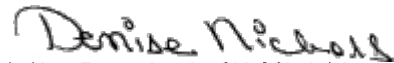
**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Matthew B. StoddardAddress: 5447 Roswell Road, Suite 204City, State, Zip Code: Atlanta, GA 30342Phone No.: 404-593-2695

An answer to this complaint, which is herewith served on you, should be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through E-file GA or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.



LeNora Ponzo, Interim Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs undenied will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Roshanda Foster

1533 Chattahoochee Circle

Roswell, GA 30075

Plaintiff's Name, Address, City, State, Zip Code

vs.

Investors Management Group, Inc.

C/o: W. Eric Fulton

16030 Ventura Blvd., Ste 240 Encino, CA 91436

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

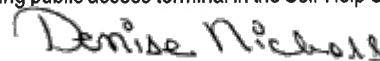
**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Matthew B. StoddardAddress: 5447 Roswell Road, Suite 204City, State, Zip Code: Atlanta, GA 30342Phone No.: 404-593-2695

An answer to this complaint, which is herewith served on you, should be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through E-file GA or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.



LeNora Ponzo, Interim Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs undenied will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY  
Civil Division

CIVIL ACTION FILE #: \_\_\_\_\_

Roshanda Foster  
 1533 Chattahoochee Circle  
 Roswell, GA 30075  
 Plaintiff's Name, Address, City, State, Zip Code

vs.

1250 North Investments, LLC  
 C/o: Corporation Services Company  
 40 Technology Pkwy South, Ste. 300 Norcross, GA 30092  
 Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input checked="" type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	
*****	
<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

**SUMMONS**

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Matthew B. StoddardAddress: 5447 Roswell Road, Suite 204City, State, Zip Code: Atlanta, GA 30342Phone No.: 404-593-2695

An answer to this complaint, which is herewith served on you, should be filed within thirty (30) days after service, not counting the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through E-file GA or, if desired, at the e-filing public access terminal in the Self-Help Center at 185 Central Ave., S.W., Ground Floor, Room TG300, Atlanta, GA 30303.



LeNora Ponzo, Interim Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs undenied will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

**SERVICE INFORMATION:**

Served, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_. \_\_\_\_\_ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

# EXHIBIT C

**IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA**

ROSHANDA FOSTER

*Plaintiff,*

vs.

LEGACY KEYS, LLC; 1250 NORTH  
INVESTMENTS, LLC; WATKINS REALTY  
SERVICES, LLC; INVESTORS MANAGEMENT  
GROUP, INC.; OAK COAST  
PROPERTIES, LLC; and JOHN DOES # 1-5

*Defendants.*

CIVIL FILE ACTION

No.: 17EV001550

**JURY TRIAL  
DEMANDED**

---

**NOTICE OF FILING AFFIDAVIT OF SERVICE**

---

**TO: Defendants and their attorneys**

PLEASE TAKE NOTICE that the below named parties were served with process on the below listed date by a duly appointed private process server:

**Party Served: Legacy Keys, LLC**  
**Date of Service: Tuesday, April 11, 2017 @ 11:12 AM**

**Party Served: Watkins Realty Services, LLC**  
**Date of Service: Tuesday, April 11, 2017 @ 11:12 AM**

**Party Served: 1250 North Investments, LLC**  
**Date of Service: Tuesday, April 11, 2017 @ 11:55 AM**

The circumstances of the service including the identity of the documents served are more fully described in the Affidavits of Service that are attached hereto as **Exhibit 1**. See O.C.G.A. § 9-11-4(h).

This 13<sup>th</sup> day of April, 2017.

**THE STODDARD FIRM**

/s/ Matthew B. Stoddard

Matthew B. Stoddard

Georgia Bar No. 558215

Attorney for Plaintiff

**THE STODDARD FIRM**

5447 Roswell Road

Suite 204

Atlanta, GA 30342

P: 404-593-2695

F: 404-264-1149

[matt@thestoddardfirm.com](mailto:matt@thestoddardfirm.com)

# **EXHIBIT 1**

IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA

ROSHANDA FOSTER,

Plaintiff,

vs.

LEGACY KEYS, LLC, ET AL.

Defendants.

CIVIL ACTION FILE NO.

17 EV 001550

AFFIDAVIT OF SERVICE OF PROCESS

COMES NOW the undersigned, Steven M. Barney, Jr., and gives this his affidavit of service of process testifying and deposing as follows:

1.

I am the age of majority and laboring with no mental disabilities. I give this affidavit based upon personal knowledge and have no financial interest in this matter.

2.

I personally served upon Legacy Keys, LLC the following documents by serving National Registered Agents, registered agent, by serving Amelia Garner, authorized to accept service, at 1201 Peachtree Street NE, Atlanta, Georgia on April 11, 2017 at 11:12 a.m.

- Summons and Complaint for Damages
- First Interrogatories SET 1 to all Defendants;
- First Request for Production SET 1 to all Defendants;
- First Request for Admissions SET 1 to all Defendants;
- Non-Party Request – Georgia Natural Gas

Further affiant sayeth not.

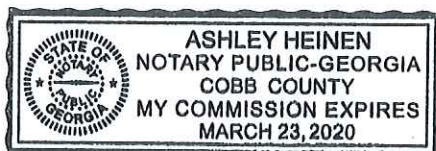
DATED this 12 day of April, 2017.

  
STEVEN M. BARNEY, JR.

Sworn to and subscribed before me this  
12th day of April, 2017.

  
Notary Public, State of Georgia

My Commission Expires: 3/23/20





IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA

ROSHANDA FOSTER,

Plaintiff,

vs.

LEGACY KEYS, LLC, ET AL.

Defendants.

CIVIL ACTION FILE NO.

17 EV 001550

AFFIDAVIT OF SERVICE OF PROCESS

COMES NOW the undersigned, Steven M. Barney, Jr., and gives this his affidavit of service of process testifying and deposing as follows:

1.

I am the age of majority and laboring with no mental disabilities. I give this affidavit based upon personal knowledge and have no financial interest in this matter.

2.

I personally served upon Watkins Realty Services, LLC the following documents by serving CT Corporation, registered agent, by serving Amelia Garner, authorized to accept service, at 1201 Peachtree Street NE, Atlanta, Georgia on April 11, 2017 at 11:12 a.m.

- Summons and Complaint for Damages
- First Interrogatories SET 1 to all Defendants;
- First Request for Production SET 1 to all Defendants;
- First Request for Admissions SET 1 to all Defendants;
- Non-Party Request – Georgia Natural Gas

Further affiant sayeth not.

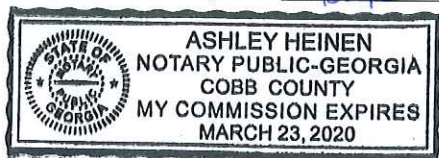
DATED this 12 day of April, 2017.

  
STEVEN M. BARNEY, JR.

Sworn to and subscribed before me this  
12<sup>th</sup> day of April, 2017.

Notary Public, State of Georgia

My Commission Expires: 3/23/20



IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA

ROSHANDA FOSTER,

Plaintiff,

vs.

LEGACY KEYS, LLC, ET AL.

Defendants.

CIVIL ACTION FILE NO.

17 EV 001550

AFFIDAVIT OF SERVICE OF PROCESS

COMES NOW the undersigned, Steven M. Barney, Jr., and gives this his affidavit of service of process testifying and deposing as follows:

1.

I am the age of majority and laboring with no mental disabilities. I give this affidavit based upon personal knowledge and have no financial interest in this matter.

2.

I personally served upon 1250 North Investments, LLC the following documents by serving Corporation Service Company, registered agent, by serving Alisha Smith, authorized to accept service, at 40 Technology Way, Suite 300, Norcross, Georgia on April 11, 2017 at 11:55 a.m.

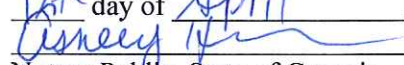
- Summons and Complaint for Damages
- First Interrogatories SET 1 to all Defendants;
- First Request for Production SET 1 to all Defendants;
- First Request for Admissions SET 1 to all Defendants;
- Non-Party Request – Georgia Natural Gas

Further affiant sayeth not.

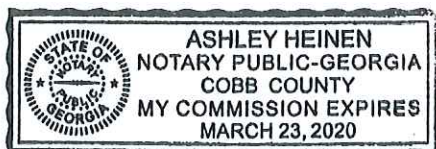
DATED this 12 day of April, 2017.

  
STEVEN M. BARNEY, JR.

Sworn to and subscribed before me this  
12<sup>th</sup> day of April, 2017.

  
Notary Public, State of Georgia

My Commission Expires: 3/23/20



**IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA**

ROSHANDA FOSTER

*Plaintiff,*

VS.

LEGACY KEYS, LLC; 1250 NORTH  
INVESTMENTS, LLC; WATKINS REALTY  
SERVICES, LLC; INVESTORS MANAGEMENT  
GROUP, INC.; OAK COAST  
PROPERTIES, LLC; and JOHN DOES # 1-5

*Defendants.*

CIVIL FILE ACTION

No.: 17EV001550

## JURY TRIAL DEMANDED

## NOTICE OF FILING AFFIDAVIT OF SERVICE

**TO: Defendants and their attorneys**

PLEASE TAKE NOTICE that the below named parties were served with process on

the below listed date by a duly appointed private process server:

**Party Served:** Investors Management Group, Inc.  
**Date of Service:** Tuesday, April 11, 2017 @ 9:40 AM

The circumstances of the service including the identity of the documents served are more fully described in the Affidavits of Service that are attached hereto as **Exhibit 1**. See O.C.G.A. § 9-11-4(h).

This 18<sup>th</sup> day of April, 2017.

## THE STODDARD FIRM

/s/ Matthew B. Stoddard  
Matthew B. Stoddard  
Georgia Bar No. 558215  
Attorney for Plaintiff

**THE STODDARD FIRM**

5447 Roswell Road

Suite 204

Atlanta, GA 30342

P: 404-593-2695

F: 404-264-1149

[matt@thestoddardfirm.com](mailto:matt@thestoddardfirm.com)

# **EXHIBIT 1**

STATE COURT OF FULTON COUNTY, GEORGIA

ROSHANDA FOSTER

Plaintiff

v.

INVESTORS MANAGEMENT GROUP, INC.

Defendant

Case No.:17EV001550

**AFFIDAVIT OF SUBSTITUTED SERVICE**

That I, GERALD M. THOMPSON hereby solemnly affirm under penalties of perjury and upon personal knowledge that the contents of the following document are true and do affirm I am a competent person over 18 years of age, not a party to this action and that I am certified and in good standing and/or authorized to serve process in the Judicial Circuit in which the process was served.

That on 4/11/2017 at 9:40 AM at 16030 VENTURA BLVD SUITE 240, ENCINO, CA 91436 I served INVESTORS MANAGEMENT GROUP, INC. with the following list of documents: SUMMONS, COMPLAINT, PLAINTIFF'S REQUEST FOR ADMISSIONS, PLAINTIFF'S REQUEST FOR PRODUCTION & NOTICE TO PRODUCE, PLAINTIFF'S INTERROGATORIES, REQUEST FOR PRODUCTION TO NON-PARTY, CERTIFICATE OF SERVICE. by then and there personally delivering a true and correct copy of the documents into the hands of and leaving with LUISA COTA whose relationship is ADMINISTRATIVE ASSISTANT.

That the description of the person actually served is as follows: Gender: Female Skin: WHITE Age: 40 Height: 5'4" Weight: 130 Hair: Eyes: Marks:

That the person with whom the documents were left with was at least 18 years of age apparently in charge at the office or usual place of business of the person served. I informed him/her of the general nature of the papers.

That I asked the person spoken to whether the Served was in the active duty military service of the United States or in the state in which this service was made and was told ☒ No they were not ☐ Yes they are ☐ No answer was given.

That if required, a copy of said documents was mailed postpaid, sealed wrapper, properly addressed to INVESTORS MANAGEMENT GROUP, INC. at 16030 VENTURA BLVD SUITE 240, ENCINO, CA 91436 on 4/11/2017 following all requirements of the State Rules in which the above captioned case is filed.

That the fee for this Service is \$ 75.00

  
GERALD M. THOMPSON  
Contracted by Direct Legal Support, Inc.  
1541 Wilshire Blvd., Suite 550  
Los Angeles, CA 90017  
(213) 483-4900

4-18-17  
Executed On:



Order #:30628  
Their File

**IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA**

ROSHANDA FOSTER

*Plaintiff,*

vs.

LEGACY KEYS, LLC; 1250 NORTH  
INVESTMENTS, LLC; WATKINS REALTY  
SERVICES, LLC; INVESTORS MANAGEMENT  
GROUP, INC.; OAK COAST  
PROPERTIES, LLC; and JOHN DOES # 1-5

*Defendants.*

CIVIL FILE ACTION

No.: 17EV001550

**JURY TRIAL  
DEMANDED**

---

**NOTICE OF FILING AFFIDAVIT OF SERVICE**

---

**TO: Defendants and their attorneys**

PLEASE TAKE NOTICE that the below named party was served with process on the below listed date by a duly appointed private process server:

**Party Served: Oak Coast Properties, LLC**  
**Date of Service: Wednesday, April 19, 2017 @ 11:35 AM**

The circumstances of the service including the identity of the documents served are more fully described in the Affidavit of Service that are attached hereto as **Exhibit 1**. See O.C.G.A. § 9-11-4(h).

This 25<sup>th</sup> day of April, 2017.

**THE STODDARD FIRM**

/s/ Matthew B. Stoddard  
Matthew B. Stoddard  
Georgia Bar No. 558215  
Attorney for Plaintiff

**THE STODDARD FIRM**

5447 Roswell Road

Suite 204

Atlanta, GA 30342

P: 404-593-2695

F: 404-264-1149

[matt@thestoddardfirm.com](mailto:matt@thestoddardfirm.com)



# **EXHIBIT 1**

STATE COURT OF FULTON COUNTY, GEORGIA

ROSHANDA FOSTER

Plaintiff

v.

OAK COAST PROPERTIES, LLC

Defendant

Case No.:17EV001550

**AFFIDAVIT OF SUBSTITUTED SERVICE**

That I, OSCAR FRANCO hereby solemnly affirm under penalties of perjury and upon personal knowledge that the contents of the following document are true and do affirm I am a competent person over 18 years of age, not a party to this action and that I am certified and in good standing and/or authorized to serve process in the Judicial Circuit in which the process was served.

That on 4/19/2017 at 11:35 AM at 24321 SOUTH POINTE DRIVE SUITE 270, LAGUNA HILLS, CA 92653 I served OAK COAST PROPERTIES, LLC with the following list of documents: SUMMONS, COMPLAINT, PLAINTIFF'S REQUEST FOR ADMISSIONS, PLAINTIFF'S REQUEST FOR PRODUCTION & NOTICE TO PRODUCE, PLAINTIFF'S INTERROGATORIES, REQUEST FOR PRODUCTION TO NON-PARTY, CERTIFICATE OF SERVICE. by then and there personally delivering a true and correct copy of the documents into the hands of and leaving with DANIELLE HOBERT whose relationship is EXECUTIVE ASSISTANT.

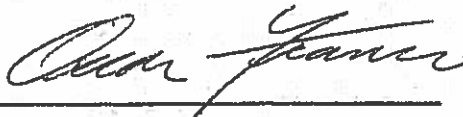
That the description of the person actually served is as follows: Gender: Female Skin: WHITE Age: 50 Height: 5'9" Weight: 180 Hair: BROWN Eyes: BLUE Marks:

That the person with whom the documents were left with was at least 18 years of age apparently in charge at the office or usual place of business of the person served. I informed him/her of the general nature of the papers.

That I asked the person spoken to whether the Service was in the active duty military service of the United States or in the state in which this service was made and was told ☒ No they were not ☐ Yes they are ☐ No answer was given.

That if required, a copy of said documents was mailed postpaid, sealed wrapper, properly addressed to OAK COAST PROPERTIES, LLC at 24321 SOUTH POINTE DRIVE SUITE 270, LAGUNA HILLS, CA 92653 on 4/19/2017 following all requirements of the State Rules in which the above captioned case is filed.

That the fee for this Service is \$ 75.00



OSCAR FRANCO  
Contracted by Direct Legal Support, Inc.  
1541 Wilshire Blvd., Suite 550  
Los Angeles, CA 90017  
(213) 483-4900

4/20/17  
Executed On:



Order #:30633  
Their File

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**ROSHANDA FOSTER,**

**Plaintiff,**

**v.**

**LEGACY KEYS, LLC; 1250 NORTH  
INVESTMENTS LLC, WATKINS  
REALTY SERVICES, LLC;  
INVESTORS MANAGEMENT  
GROUP, INC.; OAK COAST  
PROPERTIES, LLC and JOHN  
DOES #1-5,**

**Defendants.**

**CIVIL ACTION  
FILE NO. \_\_\_\_\_**

**CERTIFICATE OF SERVICE and  
CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1(C)**

This is to certify that I have this day served counsel in the foregoing matter with a copy of the foregoing **PETITION FOR REMOVAL** with Exhibits “A” through “C” attached thereto, together with Attorney’s Affidavit, Affidavit of Filing in State Court of Fulton County, and Notice of Filing by depositing in the United States Mail a copy of same in an envelope with adequate postage thereon, addressed as follows:

Matthew B. Stoddard  
THE STODDARD FIRM  
5447 Roswell Road  
Suite 204  
Atlanta, GA 30342  
Counsel for Plaintiff

Counsel for Plaintiff I further certify pursuant to Rule 7.1 of the Local Rules for the Northern District of Georgia that this document has been prepared in "Century Schoolbook" font, 13 point, as required by Local Rule 5.1(C).

Respectfully submitted this 11th day of May, 2017.

HAWKINS PARNELL  
THACKSTON & YOUNG <sup>LLP</sup>



303 Peachtree Street, N.E.  
Suite 4000  
Atlanta, Georgia 30308-3243  
(404) 614-7400  
(404) 614-7500 (facsimile)  
[skeith@hptylaw.com](mailto:skeith@hptylaw.com)

---

C. Shane Keith  
Georgia Bar No. 411317  
*Counsel for the Petitioner*